

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION**

UNITED STATES OF AMERICA

v.

HEATHER WILSON

Case No. 1:22CR35

**Violation:
18 U.S.C. § 1040a 18
U.S.C. § 1341**

INFORMATION

COUNT ONE

(18 U.S.C. § 1040(a) – Fraud in Connection with Emergency Benefits)

The United States Attorney charges that:

1. Between on or about March 21, 2020, and on or about January 16, 2021 in the Western District of Virginia and elsewhere, **HEATHER WILSON** knowingly made and caused to be made materially false, fictitious, and fraudulent statements and representations on a claim application and weekly recertifications for pandemic unemployment benefits that were authorized, paid, and disbursed in connection with the Coronavirus Disease (COVID-19) pandemic, an emergency declaration under §501 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5191).

2. The materially false, fictitious, and fraudulent statements and representation, to wit: that the claimant (1) was unemployed as a result of the COVID-19 pandemic and (2) was available to work and was actively seeking employment, were made in a matter involving a benefit transported in the mail at

some point in the authorization, disbursement, and payment of such benefit.

3. All in violation of Title 18, United States Code, § 1040(a)(2).

COUNT TWO

(18 U.S.C. § 1341 – Mail Fraud)

The United States Attorney charges that:

1. Between on or about March 21, 2020, and on or about January 16, 2021 in the Western District of Virginia and elsewhere, **HEATHER WILSON** having devised a scheme and artifice to defraud, and for obtaining money by means of materially false and fraudulent pretenses and representations, and for the purpose of executing such scheme and artifice and attempting to do so, knowingly caused to be delivered by mail according to the direction thereon a matter or thing, to wit: a monetary determination letter and PIN code, that were sent and delivered by the United States Postal Service, such matter or thing pertaining to benefits that were authorized, paid, and disbursed in connection with an emergency declaration under §501 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5191).

2. The scheme and artifice so devised was to submit fraudulent claims for pandemic unemployment benefits in order to receive funds to which **HEATHER WILSON** was not entitled by means of materially false and fraudulent representations.

3. All in violation of Title 18, United States Code § 1341.

NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Information, the defendant shall forfeit to the United States:

- a. any property, real or personal, which constitutes or is derived from proceeds traceable to said offenses, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461.

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. Money Judgment

Not less than \$5,000.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

DATE: 10/11/2022

FOR 
CHRISTOPHER R. KAVANAUGH
United States Attorney